

Exhibit 1

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

BEFORE THE SENIOR MASTER

Claim No:-

Qf 2021 - 007459

IN THE MATTER OF the Evidence (Proceedings in Other Jurisdictions) Act 1975

AND in the Matter of Rules 34.17 - 34.21 of the Civil Procedure Rules 1998

AND in the matter of a civil proceeding now pending before the United States District Court for the Southern District of New York

SKATTEFORVALTNINGEN

(THE DANISH CUSTOMS AND TAX ADMINISTRATION)

Claimant / Applicant

- and -

AVANIX MANAGEMENT LLC & OTHERS

Defendants

- and -

(1) DOUGLAS NIGEL RACKHAM

(SPECIAL ADMINISTRATOR OF SOLO CAPITAL PARTNERS LLP

AND ADMINISTRATOR TO THE ASSOCIATED ENTITIES)

(2) MICHAEL JOHN ANDREW JERVIS

(SPECIAL ADMINISTRATOR OF SOLO CAPITAL PARTNERS LLP

AND ADMINISTRATOR TO THE ASSOCIATED ENTITIES)

Respondents



UPON READING the application dated 22 June 2021 for an order for evidence to be obtained under the Evidence (Proceedings in Other Jurisdictions) Act 1975;

AND UPON READING the first witness statement of Richard Harris Dickman dated 22 June 2021 and the Letter of Request dated 14 April 2021 from the United States District Court for the Southern District of New York exhibited thereto;

AND IT APPEARING that proceedings are pending in the United States District Court for the Southern District of New York and that such Court wishes to obtain:

- (a) the production of documents from the Respondents; and
- (b) the oral evidence of the Respondents

IT IS ORDERED that:

Production of documents

1. The Respondents shall produce copies of the documents listed in Appendix A hereto to the Applicant's UK Representatives in electronic form, no later than one week prior to the Examination (as defined below). To the extent that production by photocopies or in electronic form is impractical, the Respondents shall make such documents available for inspection by the Applicant's UK Representatives.
2. The parties shall agree a time and place mutually convenient to the Applicant's UK Representatives and the Respondents for the aforementioned inspection (if applicable), which shall take place no later than one week prior to the Examination.
3. In the event that the Respondents withhold documents on the basis of privilege, the Respondents shall provide to the Applicant's UK Representatives a written statement verified by statement of truth (a "**Privilege Statement**") at the time of the document production so ordered.
4. The Privilege Statement shall include the following information in a table ordered by date: (1) date of document and/or communication; (2) a clear statement of specific grounds for withholding each document and/or communication, including the factual basis for such claims; and (3) a description of the nature of the document and/or communication.
5. Upon the Respondents' production of the documents listed in Appendix A to the Applicant's UK Representatives, the Respondents shall provide a declaration in the form of wording used in Appendix C hereto to the Applicant's UK Representatives.

Examination of witnesses

6. The Respondents do attend before Mr Josh Lewison, who is hereby appointed Examiner, and do submit to be examined upon oath or affirmation in respect of the subject matters specified in Appendix B.

7. The examination of the Respondents (the "**Examination**") shall take place at the offices of Pinsent Masons LLP at 30 Crown Place, Earl Street, London EC2A 4ES on such day and time as to be agreed between the Applicant, the Respondents and Examiner. In the event that the Examiner appoints another day and time for the Examination, the Examiner shall as soon as practicable notify the following individuals of the date and time of the Examination:
- (a) the Respondents;
 - (b) Mr Richard Dickman of Pinsent Masons LLP, 30 Crown Place, Earl Street, London EC2A 4ES ("**Applicant's UK Representatives**");
 - (c) Mr Neil J. Oxford of Hughes Hubbard and Reed LLP, One Battery Park Plaza, New York, New York 10004-1482, United States of America ("**Applicant's US Representatives**"); and
 - (d) The defendants' US representatives as listed in Appendix D ("**Defendants' US Representatives**").
8. The Examination shall be conducted in the following manner:
- (a) In accordance with English law and procedure;
 - (b) The Respondents to give evidence orally;
 - (c) Representative counsel for the Respondents be permitted to attend the Examination of the Respondents;
 - (d) The Applicant's UK Representatives and US Representatives may attend the testimony of the Respondents and each have leave to examine and re-examine the Respondents;
 - (e) The Defendants' US Representatives and UK representatives may attend the testimony of the Respondents and each have leave to cross-examine the Respondents;
 - (f) Only those questions which are relevant to the subject matter listed in Appendix B to this Order may be asked of the Respondents in the Examination;
 - (g) No question may be asked of the Respondents that in the opinion of the Examiner is not a question of a nature that could properly be asked by counsel examining a witness at trial in the High Court of justice of England & Wales;
 - (h) The Applicant will provide to the Respondents and the Defendants' US Representatives at least 7 days before the examination a paginated bundle containing copies of any documents intended to be referred to during the Examination, and no other document may be put to the Respondents without the permission of the Examiner;

- (i) The purpose of questioning in the Examination shall be for the purpose only of eliciting and recording testimony appropriate to be given at the trial in the United States District Court for the Southern District of New York;
 - (j) The Examination shall continue until completed, except that examination, cross examination and re-examination, shall not exceed 7 hours. In the absence of any agreement between the parties as to the time limits for each phase, either party shall have liberty to apply to the Senior Master who shall determine such allocations.
- 9. The Applicant's UK Representatives shall arrange for a videographer and stenographer to attend the Examination and there to videotape and transcribe the evidence of the Respondents verbatim respectively.
 - 10. The Applicant's UK Representative shall, forthwith upon receipt of a copy of the video and transcript of the Examination, send copies to the Examiner.
 - 11. The Examiner shall, forthwith upon receipt of the video and transcript of the Examination, sign the same and send them to the Senior Master for onward transmission to the United States District Court for the Southern District of New York.
 - 12. A copy of this Order shall be served forthwith on the Respondents by the Applicant's UK Representatives.
 - 13. The Examiner shall be entitled to be paid his fees and expenses of the Examination. Any such fees shall be paid by the Applicant.
 - 14. The Respondents shall be at liberty to apply to set aside or vary this Order within 7 business days of service of the Order upon the Respondents and shall serve notice of any such application to the Applicant's UK Representatives. If such application is filed, the Applicant may apply to make representations to the court within 7 business days of service of the Respondents' (or any third party's) application to set aside or vary this Order.
 - 15. The Applicant shall pay the Respondents' reasonable expenses in travelling to and from the Examination to give evidence and such sum by way of compensation for loss of time as may be specified in Practice Direction 34A.
 - 16. Permission to any person affected to apply to set aside, vary or stay this order within 7 days of service, pursuant to CPR 23.10.

Dated this 8th day of July 2021

APPENDIX A

**DOCUMENTS REQUESTED FROM DOUGLAS NIGEL RACKHAM AND / OR MICHAEL JOHN
ANDREW JERVIS OF PRICEWATERHOUSECOOPERS LLP ("PwC")**

1. The statements of the Solo Custodians' accounts holding Danish Securities at any Sub-Custodian, during the Applicable Period;
2. The bank account statements of the Solo Custodians into which any Dividend was paid, during the Applicable Period; and
3. The written correspondence between the Solo Custodians and the FCA, including filings the Custodians made with the FCA, during the Applicable Period.

Defined terms used above shall have the meaning assigned to them in the Letter of Request dated 14 April 2021.

APPENDIX B

**TOPICS FOR THE EXAMINATION OF DOUGLAS NIGEL RACKHAM AND / OR MICHAEL JOHN
ANDREW JERVIS OF PRICEWATERHOUSECOOPERS LLP ("PwC")**

1. The Solo Custodians' accounts holding Danish Securities at any Sub-Custodian, during the Applicable Period;
2. The statements of the Solo Custodians into which any Dividend was paid, during the Applicable Period;
3. The written correspondence between the Solo Custodians and the United Kingdom's Financial Conduct Authority (FCA"), including filings the Custodians made with the FCA, during the Applicable Period; and
4. Authentication of documents produced pursuant to Paragraph 11 of the Letter of Request dated 14 April 2021 from the United States District Court for the Southern District of New York, if necessary.

Defined terms used above shall have the meaning assigned to them in the Letter of Request dated 14 April 2021.

APPENDIX C

FORM OF WORDING FOR DECLARATION OF WITNESS

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF

THE KINGDOM OF DENMARK

(SKATTEFORVALTNINGEN) TAX REFUND

SCHEME LITIGATION

This document relates to: All Cases.

18-md-2865 (LAK)

DECLARATION OF [WITNESS]

I, [Witness], hereby declare as follows:

1. I am [position] at PricewaterhouseCoopers LLP ("PWC").
2. On September_, 2016, insolvency proceedings were commenced in the High Court of Justice, Chancery Division, Companies Court, whereby Solo Capital Partners LLP ("Solo Capital") was placed into special administration and Old Park Lane Capital Limited, Telesto Markets LLP, and West Point Derivatives Limited (collectively with Solo Capital, the "Solo Custodians") were placed into administration. On September 23, 2016, Douglas Nigel Rackham and Michael John Andrew Jervis (together, the "Administrators") of PWC were appointed joint special administrators of Solo Capital and joint administrators of the other Solo Custodians.
3. Upon being appointed, the Administrators secured the hard copy and electronic records of the Solo Custodians.
4. I, and others under my supervision, have reviewed the Solo Custodians' records to determine from 2012 to 2015, at which financial institutions the Solo Custodians held accounts in which they could have sub-custodied shares of Danish exchanged-traded stock on behalf of their clients. That review identified only four such institutions or sub-custodians for the period 2012 to 2015: J.P. Morgan Securities plc; Skandinaviska Enskilda Banken, Danmark; and Societe Generale SA. None of the Solo Custodians held accounts at any other sub-custodian during the period 2012 to 2015 in which shares of Danish exchanged-traded stock could have been held.

I, [witness], make these statements based on my personal knowledge, and hereby certify under penalty of perjury under [English perjury law] that the foregoing is true and correct.

Dated: [London, United Kingdom]

....., 2021

.....

[Witness]

APPENDIX D**SCHEDULE OF DEFENDANTS AND US REPRESENTATIVES**

<u>DEFENDANT</u>	<u>REPRESENTATIVES</u>
Avani Management LLC Avani Management LLC Roth 401 K Plan Batavia Capital Pension Plan Calypso Investments Pension Plan Cavus Systems LLC Cavus Systems LLC Roth 401 (K) Plan Hadron Industries LLC Hadron Industries LLC Roth 401 (K) Plan Jocelyn Markowitz Richard Markowitz RJM Capital Pension Plan RJM Capital Pension Plan Trust Routt Capital Pension Plan Routt Capital Trust	Alan E. Schoenfeld Wilmer Hale 7 World Trade Center 250 Greenwich Street New York, NY 10007 Tel: (212) 295-6401 alan.schoenfeld@wilmerhale.com
David W. Freelove Del Mar Asset Management Saving & Retirement Plan Federated Logistics LLC 401(K) Plan John C. Doscas Sterling Alpha LLC 401(K) Profit Sharing Plan	Bryan C. Skarlatos Eric Smith Kostelanetz & Fink, LLP 7 World Trade Center 250 Greenwich Street, 34th Fl. New York, NY 10007 Tel: (212) 808-8100 bskarlatos@kflaw.com esmith@kflaw.com
Azalea Pension Plan Basalt Ventures LLC Roth 401(K) Plan Bernina Pension Plan Bernina Pension Plan Trust Elizabeth Van Merkensteijn John Van Merkensteijn Michelle Investments Pension Plan Omineca Pension Plan Omineca Trust Remece Investments LLC Pension Plan Starfish Capital Management LLC Roth 401(K) Plan Tarvos Pension Plan Voojoo Productions LLC Roth 401(K) Plan Xiphias LLC Pension Plan	Caroline Ciraolo Sharon L. McCarthy Nicholas S. Bahnsen Kostelanetz & Fink, LLP 601 New Jersey Avenue, NW Suite 620 Washington, DC 20001 Tel: (202) 875-8000 cciraolo@kflaw.com smccarthy@kflaw.com nbahnsen@kflaw.com
Robert Klugman Aerovane Logistics LLC Roth 401 (K) Plan Edgepoint Capital LLC Roth 401 (K) Plan Headsail Manufacturing LLC Roth 401 (K) Plan The Random Holdings 401 K Plan	David L. Goldberg Katten Muchin Rosenman LLP 575 Madison Avenue New York, NY 10022 Tel: (212) 940-6787 david.goldberg@kattenlaw.com
Acer Investment Group LLC Alexander Jamie Mitchell III American Investment Group of New York, L.P. Pension Plan Darren Wittwer David Schulman	John C. Blessington Brandon R. Dillman Michael Waller K&L Gates LLP State Street Financial Center, One Lincoln Street

<p>DW Construction, Inc. Retirement Plan Joan Schulman Kamco Investments, Inc. Pension Plan Kamco LP Profit Sharing Pension Plan Linden Associates Defined Benefit Plan Moirra Associates LLC 401 (K) Plan Newsong Fellowship Church 401 (K) Plan Riverside Associates Defined Benefit Plan Robert Crema Stacey Kaminer</p>	<p>Boston, MA 02111 Tel: (617) 261-3100 john.blessington@klgates.com brandon.dillman@klgates.com michael.waller@klgates.com</p>
<p>Acorn Capital Corporation Employee Profit Sharing Plan Acorn Capital Strategies LLC Employee Pension Profit Sharing Plan & Trust Cambridge Way LLC 401K Profit Sharing Plan Gregory Summers Shreepal Shah</p>	<p>John Hanamirian Hanamirian Law Firm 30 Wall Street New York, NY 10005 Tel: (856) 793-9092 jmh@hanamirian.com</p>
<p>Ackview Solo 401 K Plain Aerovane Logistics LLC Roth 401 (K) Plan Blackrain Pegasus LLC Solo 401 K Plan Blue Ocean Equity LLC Retirement Plan & Trust Bradley Crescenzo Carl Andrew Vergari Cole Enterprises USA Retirement Plan & Trust CSCC Capital Pension Plan Delgado Fox LLC Solo 401K Plan Doston Bradley Edgepoint Capital LLC Roth 401 (K) Plan FiftyEightSixty LLC Solo 401K Plan Gavin Crescenzo Gyos 23 LLC Solo 401 K Plan Headsail Manufacturing LLC Roth 401 K Plan JML Capital LLC 401 K Plan John LaChance Kevin Kenning KK Law Firm Retirement Plan Trust Matthew Tucci Mitchell Protass Natoli Management Pension Plan Nova Fonta Trading LLC 401K Plan NYCATX LLC Solo 401K Plan OneZeroFive LLC Solo 401K Plan Pegasus Fox 23 LLC Solo 401K Plan RAK Investment Trust Robert Klugman Roger Lehman Sanford Villa Pension Plan Sean P. Driscoll Svetlin Petkov The 78 Yorktown Pension Plan The Aria Pension Plan The Aston Advisors LLC 401 K Plan The Atlantic DHR 401K Plan The Balmoral Management LLC 401 K Pension Plan The Beech Tree Partners 401 K Plan The Belforte Pension Plan The Bella Consultants Pension Plan</p>	<p>Mark Allison Zhanna Ziering Caplin & Drysdale, Chartered 600 Lexington Avenue, 21st Floor New York, NY 10022 Tel: (212) 379-6000 mallison@capdale.com zziering@capdale.com</p>

<p> The Blackbird 401 K Plan The Bradley London Pension Plan The Bravos Advisors 401 K Plan The Busby Black 401K Plan The Cambridge Town Line Pension Plan The Canada Rock LLC 401 K Plan The Cardinal Consulting Pension Plan The Chambers Property Management, LLC 401K Plan The Costello Advisors Pension Plan The Crow Associates Pension Plan The Diamond Scott Capital Pension Plan The Dink 14 LLC 401 K Plan The DMR Pension Plan The Dosmon BLY Pension Plan The Egret Associates LLC 401 K Plan The Eskin Pension Plan The Everything Clean LLC 401K Plan The Fieldcrest Pension Plan The FWC Capital LLC Pension Plan The Green Group Site Pension Plan The Hawk Group Pension Plan The Heron Advisors Pension Plan The Hibiscus Partners LLC 401 K Plan The Hoboken Advisors LLC 401 K Plan The Hotel Fromance Pension Plan The Houston Rocco LLC 401K Plan The India Bombay LLC 401K Pension Plan The ISDB Pension Plan The Jayfran Blue Pension Plan The Joanne E. Bradley Solo 401 K Plan The JT Health Consulting LLC 401 K Plan The Jump Group LLC 401 K Plan The KASV Group Pension Plan The Kodiak Capital Pension Plan The Krabi Holdings LLC 401 K Plan The Kyber Pension Plan The Lakeview Advisors 401 K Plan The LBR Capital Pension Plan The Lerici Capital Pension Plan The Ludlow Holdings 401 K Plan The M2F Wellness LLC 401 K Plan The Maple Advisors LLC 401 K Plan The Monin Amper Pension Plan The Mountain Air LLC 401 K Plan The MPQ Holdings LLC 401 K Plan The Mueller Investments Pension Plan The NYC Stanismore Pension Plan The Oak Tree One 401 K Plan The Oaks Group Pension Plan The Osprey Assocs. LLC 401 K Plan The Patrick Partners Conglomerate Pension Plan The Petkov Management LLC 401 K Plan The Petkov Partners Pension Plan The Proper Pacific LLC 401K Plan The Random Holdings 401 K Plan The RDL Consulting Group LLC Pension Plan The Regoleth Pension Plan The Robin Daniel Pension Plan </p>	
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<p> The Saba Capital LLC 401 K Plan The Sandpiper Pension Plan The Sea Bright Advisors LLC 401K Plan The Sector 230 LLC 401K Plan The Shapiro Blue Management LLC 401K Plan The Sinclair Pension Plan The SKSL LLC Pension Plan The Skybax LLC 401K Plan The Snow Hill Pension Plan The SPKK LLC 401 K Plan The Stark Pension Plan The Stor Capital Consulting LLC 401 K Plan The SVP 401K Plan The Tag Realty Advisors LLC 401K Plan The Texas Rocco LLC 401K Plan The Throckmorton Advisors 401 K Plan The TKKJ LLC 401K Plan The Valerius LLC Solo 401 K Plan The Wave Maven LLC 401K Plan The West River Pension Plan The Westport Advisors LLC 401 K Plan The Westridge Ave LLC 401 K Plan The Zen Training LLC 401(K) Plan Thomas Kertelits Todd Bergeron Vincent Natoli </p>	
<p> Andrea Tew Autoparts Pensions Group Trust Bernard Tew Bluegrass Investment Management, LLC Bluegrass Investment Management, LLC Retirement Plan Bluegrass Retirement Group Trust Casting Pensions Group Trust Central Technologies Pensions Group Trust Industrial Pensions Group Trust Stephanie Tew SV Holdings, LLC Retirement Plan Tew Enterprises, LLC Retirement Plan Tew, LP Retirement Plan Vincent Tew </p>	<p> Mark J. Hyland Thomas Ross Hooper Seward & Kissel LLP One Battery Park Plaza New York, NY 10004 Tel: (202) 737-8833 hyland@sewkis.com hooper@sewkis.com </p> <p> Philip W. Collier John W. Pollom Stites & Harbison PLLC 400 West Market Street Suite 1800 Louisville, Kentucky 40202 Tel: (502) 587-3400 pcollier@stites.com jpollom@stites.com </p>
<p> Scott Goldsetein Sheldon Goldstein The Goldstein Law Group PC 401 (K) Profit Sharing Plan </p>	<p> Martin H. Kaplan Kari Parks Gusrae Kaplan Nusbaum PLLC 120 Wall Street New York, New York 10005 Tel: (212) 269-1400 mkaplan@gusraekaplan.com kparks@gusraekaplan.com </p>
<p> Albedo Management LLC Roth 401(K) Plan Ballast Ventures LLC Roth 401 (K) Plan Bareroot Capital Investments LLC Roth 401 (K) Plan Battu Holdings LLC Roth 401 K Plan </p>	<p> Michelle A. Rice Kaplan Rice LLP 142 West 57th Street, Suite 4A New York, NY 10019 Tel: (212) 235-0300 </p>

<p> Cantata Industries LLC Roth 401 (K) Plan Cedar Hill Capital Investments LLC Roth 401(K) Plan Crucible Ventures LLC Roth 401(K) Plan David Zelman Dicot Technologies LLC Roth 401(K) Plan Eclouge Industry LLC Roth 401(K) Plan Edwin Miller Fairlie Investments LLC Roth 401(K) Plan First Ascent Worldwide LLC Roth 401 (K) Plan Fulcrum Productions LLC Roth 401 (K) Plan Green Scale Management LLC Roth 401(K) Plan Joseph Herman Keystone Technologies LLC Roth 401(K) Plan Limelight Global Productions LLC Roth 401(K) Plan Loggerhead Services LLC Roth 401 (K) Plan Monomer Industries LLC Roth 401 (K) Plan PAB Facilities Global LLC Roth 401(K) Plan Perry Lerner Pinax Holdings LLC Roth 401 (K) Plan Plumrose Industries LLC Roth 401K Plan Roadcraft Technologies LLC Roth 401(K) Plan Robin Jones Ronald Altbach Sternway Logistics LLC Roth 401 (K) Plan Trailing Edge Productions LLC Roth 401 (K) Plan True Wind Investments LLC Roth 401 (K) Plan Tumba Systems LLC Roth 401 (K) Plan Vanderlee Technologies Pension Plan Vanderlee Technologies Pension Plan Trust </p>	<p> mrice@kaplanrice.com </p>
<p>ED&F Man Capital Markets, Ltd.</p>	<p> Neil S. Binder Binder & Schwartz, LLP 366 Madison Avenue, 6th Floor New York, NY 10017 Tel: (212) 510-7031 nbinder@binderschwartz.com </p>
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2321 Capital Pension Plan Bowline Management Pension Plan Lion Advisory Inc. Pension Plan	Robert H. Pees Akin Gump Strauss Hauer & Feld LLP One Bryant Park Bank of America Tower New York, NY 10036 Tel: (212) 872-1000 rpees@akingump.com
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UNREPRESENTED DEFENDANTS

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